

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
HEIDI A. OJEDA  
3 Assistant Federal Public Defender  
Nevada Bar No. 12223  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Heidi\_Ojeda@fd.org

7 Attorney for Edward Snoeck

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EDWARD SNOECK,

15 Defendant.

Case No. 2:18-cr-00284-JCM-VCF

**Stipulation to Continue Supplement's  
Deadline to Motion for  
Compassionate Release  
(First Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.  
20 Ojeda, Assistant Federal Public Defender, counsel for Edward Snoeck, request that the due date  
21 for Mr. Snoeck's Supplement to Motion for Compassionate Release (ECF No. 142), be  
22 extended from January 19, 2024, to February 19, 2024; and that the due date for the  
23 government's response be extended until March 4, 2024.

24 This Stipulation is entered into for the following reasons:  
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1           1.       On January 5, 2024, Mr. Snoeck filed a motion seeking an order reducing her  
2 sentence or modifying her judgment under the compassionate release statute at 18 U.S.C. §§  
3 3582(c) and 3553(a). ECF No. 142.

4           2.       Defense counsel has not had the opportunity to speak with Mr. Snoeck to discuss  
5 related issues to the motion.

6           3.       Defense counsel needs additional time to investigate Mr. Snoeck's personal and  
7 family medical issues, which are pertinent to the supplement.

8           4.       The additional time requested by the stipulation is made in good faith and not  
9 for purposes of delay.

10          5.       The defendant is in custody and agrees with the need for a continuance.

11          6.       The parties agree to the continuance.

12          This is the first request for a continuance of the supplement deadline.

13          DATED this 12th day of January, 2024.

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15       RENE L. VALLADARES  
16       Federal Public Defender

          JASON M. FRIERSON  
          United States Attorney

17       By /s/ Heidi A. Ojeda  
18       HEIDI A. OJEDA  
19       Assistant Federal Public Defender

          By /s/ Jim W. Fang  
          JIM W. FANG  
          Assistant United States Attorney

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOECK,

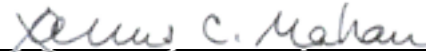
Defendant.

Case No. 2:18-cr-00284-JCM-VCF

ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for filing her Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended to February 19, 2024; and that the Government's deadline to file its response is extended to March 4, 2024.

DATED January 16, 2024.

  
UNITED STATES DISTRICT JUDGE